

1 Anna Maria Martin (Bar No. 7079)
amartin@mmhllp.com
2 MESERVE, MUMPER & HUGHES LLP
3 316 California Ave. #216
Reno, Nevada 89509
4 800 Wilshire Boulevard, Suite 500
Los Angeles, California 90017-2611
5 Telephone: (213) 620-0300
6 Facsimile: (213) 625-1930
7 Attorneys for Defendant
LIFE INSURANCE COMPANY OF NORTH
8 AMERICA
9 Thomas H. Fell (Bar No. 3717)
tfell@fclaw.com
FENNEMORE CRAIG, P.C.
10 300 South Fourth Street, Suite 1400
Las Vegas, Nevada 89101
11 Telephone: (702) 692-8000
12 Ryan C. Curtis (Bar No. 12949)
rcurtis@fclaw.com
FENNEMORE CRAIG, P.C.
13 2394 Camelback Road, Suite 600
14 Phoenix, Arizona 85016-3429
15 Telephone: (602) 916-5426
Facsimile: (602) 916-5626
16 Attorneys for Defendant
17 CAESARS ENTERPRISE SERVICES, LLC

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 IRINA MILLER,
21 Plaintiff,

22 vs.

23 CAESARS ENTERPRISE SERVICES,
LLC, as Plan Administrator of the Caesars
24 Enterprise Services, LLC Welfare Benefit
Plan; and LIFE INSURANCE
25 COMPANY OF NORTH AMERICA, as
Claims Administrator for the Caesars
26 Enterprise Services, LLC Welfare Benefit
Plan,

27 Defendants.
28

Case No. 2:18-cv-00287-GMN-PAL

**STIPULATION TO EXTEND
TIME FOR LIFE INSURANCE
COMPANY OF NORTH
AMERICA AND CAESARS
ENTERPRISE SERVICES, LLC,
AS PLAN ADMINISTRATOR OF
THE CAESARS ENTERPRISE
SERVICES, LLC WELFARE
BENEFIT PLAN TO ANSWER OR
OTHERWISE RESPOND TO THE
AMENDED COMPLAINT [First
Request]]**

Judge: Gloria M. Navarro
Dept: 7D

Complaint Filed: Februarv 15. 2018

Case No. 2:18-cv-00287-GMN-PAL
STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO ANSWER/RESPOND TO
THE AMENDED COMPLAINT [First Request]]

1 WHEREAS, Defendant LIFE INSURANCE COMPANY OF NORTH
 2 AMERICA (“LINA”) was served with the Amended Complaint in this action by
 3 Plaintiff IRINA MILLER (“Plaintiff”) on March 26, 2018, which was filed in the
 4 United States District Court, District of Nevada;

5 WHEREAS, the deadline for LINA to respond to the Amended Complaint is
 6 presently April 16, 2018;

7 WHEREAS, LINA’s counsel requires time to review and assess the file in
 8 order to prepare an adequate response to the Amended Complaint;

9 WHEREAS, the Complaint was amended to add Defendant CAESARS
 10 ENTERPRISE SERVICES, LLC, as Plan Administrator of the Caesars Enterprise
 11 Services, LLC Welfare Benefit Plan (“CAESARS”) and CAESARS was served with
 12 the Amended Complaint on March 13, 2018, which was filed in the United States
 13 District Court, District of Nevada;

14 WHEREAS, CAESARS’ counsel likewise requires time to review and assess
 15 the file, which it is in the process of obtaining from LINA, in order to prepare an
 16 adequate response to the Amended Complaint.

17 WHEREAS, for good cause and pursuant to Local Rule IA 6-1, the parties
 18 wish to extend the time within which a responsive pleading to the Amended
 19 Complaint must be filed and served by LINA and CAESARS by thirty (30) days
 20 from the date LINA’s response is currently due, to May 16, 2018;

21 WHEREAS, this is the first stipulation for extension of time to file a
 22 responsive pleading to the Amended Complaint;

23 IT IS HEREBY STIPULATED by and between Plaintiff and LINA and
 24 CAESARS, by and through their respective attorneys of record, that the time within
 25 which a responsive pleading to Plaintiff’s Amended Complaint must be filed and
 26 served by LINA and CAESARS is extended to May 16, 2018.

27 ///

1 **IT IS SO STIPULATED.**

2 Dated: April 2, 2018

Julie A. Mersch
LAW OFFICE OF JULIE A. MERSCH

3

4

5

By: /s/ Julie A. Mersch
Julie A. Mersch
Attorneys for Plaintiff
IRINA MILLER

6

7

8 Dated: April 2, 2018

Anna Maria Martin
MESERVE, MUMPER & HUGHES LLP

9

10

By: /s/ Anna Maria Martin
Anna Maria Martin
Attorneys for Defendant
LIFE INSURANCE COMPANY
OF NORTH AMERICA

11

12

13

14 Dated: April 2, 2018

Ryan C. Curtis
Thomas H. Fell
FENNEMORE CRAIG

15

16

17

By: /s/ Ryan C. Curtis
Ryan C. Curtis
Attorneys for Defendant CAESARS
ENTERPRISE SERVICES, LLC.

18


19

20

IT IS SO ORDERED:

21

22 Dated: April 6, 2018


The Honorable Peggy A. Leen
United States Magistrate Judge

23

24

25

26

27

28